

CLERKS OFFICE U.S. DIST. COURT  
AT LYNCHBURG, VA  
FILED

1/19/2023

LAURA A. AUSTIN, CLERK  
BY: s/ CARMEN AMOS  
DEPUTY CLERKIN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA )

v. )

CARLOS WARREN )

Criminal No.: 3:23CR00003STATEMENT OF FACTS

The parties stipulate that the allegations contained in the Information and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt. Furthermore, the following facts are not the only facts known to the parties, but are sufficient to establish each element of both counts of the Information. Both parties reserve the right to present additional facts at any subsequent stage of this proceeding including, but not limited to, sentencing.

1. Starting at least as early as June 2016, and continuing until March 2022, Defendant Carlos WARREN owned, bred, and maintained numerous dogs for the purpose of fighting with other dogs.

2. Because of their conditioning and training, dogs used in animal fighting ventures are housed separately from other dogs – in pens, cages, or on chains – so that they will not hurt or kill other dogs when the handler is absent. Heavy chains are often used when restraining dogs to develop neck strength in dogs used for fighting purposes. Due to the dogs being restrained by chains for extended periods of time in the same location, “chain spots” are developed in the location where they are living. “Chain spots” are generally circle-shaped spots worn into the earth by a moving dog and its chain when the dog has been chained to a secure spot for an extended period of time. The size and shape of the chain spots are determined by the length of the chain and how it is secured. Chain spots are good indicators that dogs are being kept on a property in a manner consistent with dog fighting ventures. Dog fighters utilize the term “yard” to describe the areas where they keep their fighting dogs on their property.

3. WARREN maintained a yard on his property in Virginia where he maintained and trained numerous fighting dogs. In addition, he maintained dogs in a yard at a location in Mexico.

4. WARREN communicated with other dog fighters via internet messaging services and used numerous aliases, including but not limited to “CW” and “Los Dogman Black Angel.”

5. In these communications, WARREN discussed efforts to breed fighting animals for sale, arranged for fights between various dogs, discussed providing his “vet tech” services during dog fights, the results of dog fights, wagers and fees for such dog fights, and other information related to dog fighting. In addition, in or around March 2021, after federal agents

Defendant's Initials: CW

with the United States Department of Agriculture confronted WARREN on his property in Rapidan, Virginia, WARREN and a co-conspirator discussed destroying voluminous electronic evidence related to the promotion of animal fighting, such as destroying evidence related to the dog-fighting periodical discussed below.

6. During sometime in 2016 until approximately the end of 2021, WARREN attended numerous animal fighting ventures where he exhibited his own fighting dogs, paid fees and made/solicited wagers for dog fights with his and other dogs, handled dogs while fighting, and provided treatment for dogs during and after fights. WARREN also personally killed, and observed other dog fighters killing, various dogs who "lost" animal fights by shooting, drowning, hanging, strangling, and electrocuting such dogs.

7. During sometime in 2016 until approximately the end of 2021, WARREN authored, edited, published, and circulated "the Connector" periodical via the U.S. mails, internet, and other interstate communication instrumentalities. This periodical was circulated between California, Virginia, New Mexico, Puerto Rico, and other States and Territories. This periodical contained interviews of known dog fighters, the results of various dog fights, and breeding and pedigree information for fighting dogs. In addition, WARREN advertised for sale various medications that could be used to treat fighting dogs during and after dog fights.

8. As recently as March 2022, WARREN operated a dog fighting "yard" on his property located in Rapidan, Virginia. That yard contained at least 11 fighting dogs that were being used in dog fighting ventures. In addition, these dogs' reproductive materials were being marketed for use in breeding dogs for other animal fighting ventures. WARREN possessed devices and items associated with raising fighting dogs to include various "mills" and exercise wheels, wooden sticks and hooks used to pry open dogs' jaws, paddles, and chain collars.

Many of the above-described actions by WARREN occurred in the Western District of Virginia.

*Defendant's Initials:* CW

The actions taken by WARREN as described above were taken willfully, knowingly, and with the specific intent to violate the law. WARREN did not take those actions by accident, mistake, or with the belief that they did not violate the law. WARREN acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity nor does it constitute all of the facts known to either party.

Respectfully submitted,



Heather L. Carlton

Assistant United States Attorney

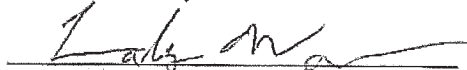


Todd W. Gleason

Senior Trial Attorney

Environmental Crimes Section

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Carlos Warren

Defendant

I am Carlos Warren's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Mark Williams, Esquire

Counsel for Defendant

Defendant's Initials: ch